

REMARKS

Reconsideration and allowance of pending Claims 1-10 and 12-44 are respectfully requested in view of the foregoing amendments and the following remarks.

35 U.S.C. §102

Claims 40-42 were rejected under 35 U.S.C. §102(b) as being anticipated by the description on page 89 of the Honda Accord 1996 Owner's Manual (hereafter "The Owner's Manual"). In view of the present amendments to Claims 40 and 41, the Applicant respectfully traverses the rejection and further requests that the rejection be reconsidered and withdrawn.

Page 89 of The Owner's Manual describes the "Auto Select" for a car stereo. As set forth in The Owner's Manual, "Auto Select" causes both the AM and FM radio bands to be scanned for stations with strong signals, and further causes six of such AM stations and 12 of such FM stations to be saved. However, contrary to amended Claims 40 and 41, the description of the "Auto Select" feature does not teach or even suggest that it is able to determine tuning frequencies for an associated set of *television* channels. Accordingly, it is respectfully submitted that not all of the features recited in amended independent Claim 40, as well as dependent Claims 41 and 42, are taught by The Owner's Manual. Therefore the rejection of independent Claim 40, as well as dependent Claims 41 and 42, under 35 U.S.C. §102(b) should be withdrawn.

1 35 U.S.C. §103

2 Claims 1-10, 13-39, 43, and 44 were rejected under 35 U.S.C. §103(a) as
3 being unpatentable over Yoshida (U.S. Patent 5,363,142) in view of Albert
4 Nalbandian (ITU-R Studies on Spectrum Management/Albert Nalbandian/ITU-BR
5 SGD02/05/98; hereafter "Nalbandian"). The Applicant respectfully traverses this
6 rejection, and further requests that this rejection be reconsidered and withdrawn.

7 Yoshida describes a method for changing microcomputer specifications in
8 television sets at the time of initializing (*i.e.*, first power on) for the purpose of
9 using a particular television set in multiple foreign destinations (see Title and col.
10 1, line 62 – col. 2, line 1). That is, Yoshida initializes the television
11 microcomputer to comply with an appropriate regionalized television standard. It
12 is respectfully submitted that Yoshida does not teach or suggest the features
13 presently claimed.

14 Claim 1 recites a television tuner comprising:

15 a country table listing a plurality of countries;
16 multiple channel-to-frequency mapping tables
17 correlating channel numbers to corresponding
18 frequencies for associated countries in the country
19 table, the channel-to-frequency mapping tables being
20 indexed by the country table so that selection of a
21 country in the country table references an associated
22 channel-to-frequency mapping table for the selected
23 country; and

24 a tuning device to tune to a particular frequency
25 within the channel-to-frequency mapping table
26 associated with the selected country upon selection of
27 a corresponding channel.

28 On the other hand, Yoshida describes an 8-bit custom data code, entered by
29 a remote control device, having an upper four bits to power on a television and a

1 lower four bits to identify the destination for the television, referred to as a
2 destination code (col. 3, lines 3 and 4). However, the destination codes do not
3 necessarily reference a "country table listing a plurality of countries," contrary to
4 the rejection as applied to Claims 1 and 2. That is, the examples provided in col. 3
5 of Yoshida describe initializing televisions destined for Japan, Europe, and the
6 U.S.A. Clearly Europe is not a country but rather a continent. So first of all,
7 Yoshida's lack of clarity regarding the definition of a "destination" and usage of
8 "Europe" as an example destination provide little support for the point of rejection
9 set forth on page 4 of the Office Action that, "Yoshida's system *must* configure
10 with a set/table of plurality of countries code in order to recognize the receiving
11 country code," (emphasis added here).

12
13 More significantly, the rejection continues by acknowledging, on page 4
14 that Yoshida does not clearly disclose that "the country table references to an
15 associated channel-to-frequency mapping table for the selected country," as
16 recited in Claim 1. In support of this point of rejection, the Office Action cites
17 col. 3, lines 13-17, asserting that, "Yoshida disclose the system perform [sic]
18 necessary preparation such as band and channel setting according to the receiving
19 country code." Applicants respectfully submit that such characterization of the
20 reference is incorrect. The cited portion of the reference (col. 3, lines 13-17)
21 actually discloses that the computer performs "necessary preparations such as
22 band and channel setting or circuit selection according to the programs used in
23 Europe, such as SECAM/PAL, VHF-L/VHF systems," (emphasis added). Thus,
24 the cited portion of the description actually indicates that Yoshida initializes the
25 television microcomputer to comply with an appropriate television standard (e.g.,

1 SECAM/PAL, VHF-L/VHF) corresponding to the input destination code. That is,
2 the disclosed band and channel setting or circuit selection are being set to comply
3 with the television standard appropriate for the destination corresponding to the
4 entered code. Contrary to the rejection, such description lacks any teaching or
5 suggestion of multiple channel-to-frequency mapping tables correlating channel
6 numbers to corresponding frequencies for associated countries in the country
7 table," as claimed.

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9 The rejection continues, presumably directed to Claim 3 and with regards to
10 the discussion regarding Yoshida's lack of disclosure regarding a country table, by
11 asserting that it would have been obvious to one of ordinary skill in the art to
12 combine Yoshida with the ITU table described by Nalbandian to provide a country
13 table list according to ITU standards. However, Nalbandian does not show a
14 country table listing a plurality of countries, but rather describes a table organized
15 into three ITU regions for the purpose of assigning and allotting radio bands and
16 services (sec. 4.1). Thus, Nalbandian fails to fill an acknowledged void left by
17 Yoshida, relative to the rejected claim, by failing to provide a country table listing
18 a plurality of countries.

19 Furthermore, combining Yoshida's method of initializing a television
20 standard based on a destination code with Nalbandian's ITU-R radio band and
21 service assignment and allocation table, as proposed by the rejection, would not
22 have been obvious to one of ordinary skill in the art considering that Yoshida is
23 directed to regionalized television standards and Nalbandian is directed to radio
24 bands and services. Unlikely as such combination of references may be, the result
25 is a television being initialized according to the standards appropriate for the

1 television's destination region. Clearly then, the proposed combination of
2 references fails to render the present claims obvious.

3 Accordingly, for at least the reasons set forth above, it is respectfully
4 submitted that Claims 1-3 would not have been obvious to one of ordinary skill in
5 the art over Yoshida in view of Nalbandian. Further, without conceding any
6 relation among the claims, Applicants submit that Claims 5-7, 21, and 32-34 are
7 also distinguished from the proposed combination of references for at least the
8 reasons discussed above, since all of Claims 1-3, 5-7, 21, and 32-34 were rejected
9 under the same rationale.

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11 With regards to Claims 4, 8, 22, and 35, Applicants submit that the
12 rejection, once again, incorrectly characterizes the reference. The cited portion of
13 Yoshida, col. 3, lines 15-18, actually describes that the microcomputer performs
14 "necessary preparations such as band and channel setting or circuit selection
15 according to the programs used in Europe, such as SECAM/PAL, VHF-L/VHF
16 systems," thus indicating that the band and channel setting and circuit selection are
17 performed to comply with an appropriate regionalized television standard. Such
18 function does not require, nor does it even suggest, multiple channel-to-frequency
19 mapping tables, as recited in Claim 1 and the other independent claims from which
20 Claims 4, 8, 22, and 25 depend.

21 Claim 9 depends from Claim 5, and is therefore distinguishable from
22 Yoshida and Nalbandian for at least the reasons set forth above regarding Claim 5.

23
24 Claim 10 also depends from Claim 5, and is therefore distinguishable from
25 Yoshida and Nalbandian for at least the reasons set forth above regarding Claim 5

1 as well. The inclusion of a tuner in a television according to Yoshida fails to
2 compensate for the deficiencies of the references as described above with regards
3 to Claim 5.

4 Claim 13 was rejected using a combination of points made to reject Claims
5 1-8, 10, and 12. Therefore, for at least the reasons described above regarding such
6 claims, it is submitted that Claim 13 is distinguishable from Yoshida. The same is
7 applicable for Claim 19, which has been rejected for the same reasons as Claim
8 13.

9 Claim 14 is distinguished from the cited references for the reasons set forth
10 above regarding Claim 13.

11 Claims 15-17 depend from Claim 13, and are therefore distinguishable
12 from the cited reasons set forth above regarding Claim 14.

13 With regards to Claims 18 and 23, Applicants disagree with the assertion
14 that, "Yoshida in view of Nalbandian tuner module/code segment (computer
15 program) must store a set of television frequencies that map to corresponding
16 channels within the particular country for subsequent retrieval as disclosed." As
17 set forth above regarding independent Claims 1 and 5, neither reference requires
18 multiple channel-to-frequency mapping tables, nor is the inclusion of such features
19 even suggested. Without such disclosure, the assertion that the references *must*
20 store a set of television frequencies, etc., is conjecture.

21 In view of the repeated points of rejection, the following claims are
22 distinguished from the proposed combination of references as follows:
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1 Claim 20 is distinguishable for the reasons set forth above regarding Claims
2 1-3 and 5-7;

3 Claims 24 and 25 is distinguishable for the reasons set forth above
4 regarding Claims 13 and 19; and

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6 Claims 26-31, and 36-39, 43, and 44 are distinguishable for the reasons set
7 forth above regarding Claims 1-3, 5-7, 21, and 32-34.

8
9 It is respectfully submitted that at least the above arguments distinguish the
10 rejected claims from the references of Yoshida and Nalbandian, both singularly
11 and in combination as proposed in the Office Action. Therefore, it is respectfully
12 requested that the rejection of Claims 1-10, 13-39, 43, and 44 under 35 U.S.C.
13 §103(a) be withdrawn.

14 Claim 12 was rejected under 35 U.S.C. §103(a) as being unpatentable over
15 Yoshida in view of The Owner's Manual. The Applicant respectfully traverses
16 this rejection as well, and further requests that this rejection also be reconsidered
17 and withdrawn.

18 Yoshida does not describe a tuner for scanning multiple channels within a
19 particular destination for corresponding frequencies and for storing tuning
20 frequencies for the destination. Rather, Yoshida initializes the television
21 microcomputer to comply with an appropriate regionalized television standard
22 (e.g., SECAM/PAL, VHF-L/VHF). As described at col. 3, lines 5-18, Yoshida
23 actually discloses that a microcomputer in a television performs "necessary
24 preparations such as band and channel setting or circuit selection according to the
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1 programs used in Europe, such as SECAM/PAL, VHF-L/VHF systems,"

2 (emphasis added). Thus, the description indicates that Yoshida initializes the

3 television microcomputer to comply with an appropriate regionalized television

4 standard (e.g., SECAM/PAL, VHF-L/VHF) corresponding to the input destination

5 code. Such deficiency, with respect to the rejected claim, is not compensated for

6 by The Owner's Manual, nor is such assertion made in the rejection.

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8 Further, there is no teaching by either reference to suggest that the radio

9 "Audio Scan" feature described in The Owner's Manual would comport with the

10 television initializing method described by Yoshida.

11 Therefore, for at least the reasons discussed above, it is respectfully

12 submitted that the proposed combination of Yoshida and The Owner's Manual fail

13 to render Claim 12 obvious. Accordingly, the rejection of Claim 12 under 35

14 U.S.C. §103(a) should be withdrawn.

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3 **Conclusion**
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5 The remaining references of record have been studied. It is respectfully
6 submitted that they do not compensate for the deficiencies of the reference
7 discussed above with regards to the pending claims.

8 All rejections having been addressed, it is respectfully submitted that all of
9 pending claims 1-10 and 12-44 are in condition for allowance. Early and
10 forthright issuance of a Notice to that effect is earnestly solicited. If any issues
11 remain that prevent issuance of this application, the Examiner is urged to contact
12 the undersigned attorney before issuing a subsequent Action.
13

14 Respectfully submitted,

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